REMARKS

The present application was filed on November 26, 2003 with claims 1-18. Claims 1-18 were pending in the application prior to the amendments herein. Claims 1 and 16-18 are the independent claims.

In the outstanding Office Action dated March 28, 2006, the Examiner: (i) objected to the drawings as failing to comply with 37 CFR 1.84(p)(4); (ii) rejected claims 1, 3, 8, 11, 12 and 18 under 35 U.S.C. §101; (iii) rejected the term "annotation" under 35 U.S.C. §112; (iv) rejected claims 1-11 and 15-18 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,697,799 (hereinafter "Neal"); and (v) rejected claims 12-14 under 35 U.S.C. §103(a) as being unpatentable over Neal in view of Handschuh et al. article entitled "S-CREAM – Semi-Automatic Creation of Metadata" (hereinafter "Handschuh").

In this response, Applicants respectfully amend claims 1 and 18, add new claim 19, and revise the drawings. Applicants respectfully request reconsideration of the present application in view of the amendments above and remarks below.

Regarding the objection to the drawings, FIG. 4 has been corrected to associate reference numeral "420" with "Military Unit", and removed the second occurrence of 420, which should overcome the objection. A replacement sheet for FIG. 4 is attached.

Independent claims 1 and 18 have been amended to overcome the §101 rejection. Amended claim 1 is directed to a method of determining an annotation for a document, the method comprising the steps of: obtaining a user-proposed annotation to be associated with the document; and automatically determining, in accordance with a knowledge base, whether the user-proposed annotation matches at least one allowed annotation, wherein the user-proposed annotation may be associated with the document when the user-proposed annotation matches at least one allowed annotation.

Applicants point out that the document of the claimed invention is the object being manipulated. The annotated document is the tangible result of the object/document manipulation. Accordingly, the Applicants respectfully request the §101 rejection to be withdrawn. Independent claims 16 and 17 were not rejected under §101.

With regard to the §112 rejection, Applicants respectfully traverse. "Annotation" is a term common to any person skilled in the art which to the invention pertains, or with which it is most nearly connected. In the Background of the Invention, Applicants point to various references which utilize the term "annotation." For example, in C.A. Goble et al., "Describing and Classifying Multimedia Using the Description Logic GRAIL," SPIE, 1996, paragraph 1.2, "annotations are commonly expressed as keywords associated with the image or image sets, organized into indexes and frequently using SQL as the query language. Keyword annotations do not replace image – based descriptions-describing texture or shape with words is hard or impossible – but complement them." In Handschuh, a prior art of the record, the term "annotation" is connoted as: "a set of instantiations attached to an HTML document" (see Handschuh p. 2, paragraph 2.1). Furthermore, the Handschuh reference notes that "often, the term 'annotation' is used to mean something like 'private or shared note', 'comment' or 'Dublin Core metadata'. This alternative meaning of annotation may be emulated in [their] approach by modelling these notes with attribute instances. For instance, a comment note 'I like this paper' would be related to the URL of the paper via an attribute instance 'has- Comment'" (see Handschuh p. 3, paragraph 2.1).

While Applicants assert that the term is not limited to these above examples, Applicants have clearly used the term "annotation" within the ordinary meaning of the term. Therefore, the rejection under §112, first paragraph, should be withdrawn.

With respect to the §102(e) rejection, Examiner has misinterpreted the specification at p. 2, lines 3-5 and FIGS. 2-4 to suggest the term "annotation" to mean "classification."

In characterizing the Neal reference as allegedly meeting certain limitations of claim 1, the Examiner relies primarily on col. 2 lines 23-28 and FIG. 8. However, the relied-upon portions of Neal fail to anticipate the limitations as alleged.

The Neal reference, in col. 2, lines 23-28, states the following:

> The present invention allows an item to automatically be classified using its attributes based on a classification schema and a knowledge base. The invention can include selecting a first attribute of the item, designating a first search strategy comprising the value of the first attribute applied to operate upon data records in a first database.

While Neal is directed to automatically classifying items by creating categories to group like items, like an electronic catalog in some form (see col. 3, lines 24-41), the claimed invention is distinguishable from Neal. The claimed invention is directed towards an improved technique for annotating documents, not classifying items by creating categories to group like items, as disclosed in Neal.

Accordingly, it is believed that the teachings of Neal fail to meet the limitations of amended claim 1, that is, obtaining a user-proposed annotation to be associated with the document, and automatically determining, in accordance with a knowledge base, whether the user-proposed annotation matches at least one allowed annotation, wherein the user-proposed annotation may be associated with the document when the user-proposed annotation matches at least one allowed annotation.

Independent claims 16-18 include limitations similar to those of claim 1, and are therefore believed allowable for reasons similar to those described above with reference to claim 1.

Dependent claims 2-15 and 19 are believed allowable for at least the reasons identified with regard to claim 1.

In view of the foregoing, claims 1-19 are believed to be in condition for allowance.

Respectfully submitted,

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